

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION

JOSEPH MUNDY,)
Plaintiff,)
v.)
YELLOW TRANSPORTATION COMPANY, INC.,) Case No.: 08 C 1576
SHORT-TERM DISABILITY PLAN, Designated for)
Employees of Yellow Transportation, Inc.; YELLOW) Judge Bucklo
TRANSPORTATION COMPANY, INC. LONG-)
TERM DISABILITY PLAN, Designated for) Magistrate Judge Valdez
Employees of Yellow Transportation, Inc.; CIGNA)
CORPORATION, in its capacity as Administrator of)
the Plans;)
Defendants.)

AGREED MOTION FOR EXTENSION OF TIME

Defendants, LIFE INSURANCE COMPANY OF NORTH AMERICA (“LINA”), and
YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN
 (“LTD Plan”), by their undersigned counsel, respectfully move this Honorable Court for a six
 day extension of time, from June 19, 2008 to June 25, 2008, to answer plaintiff’s complaint,
 stating as follows:

1. The answer of LINA and the LTD Plan is due June 19, 2008, with three prior
 extensions that were sought to enable defense counsel and plaintiff’s counsel to reach an
 agreement about who are the proper defendants to plaintiffs’ claims. The undersigned counsel
 have now prepared an answer to the complaint on behalf of LINA and the LTD plan. Counsel
 recently learned that LINA’s in-house attorney who is responsible for this case will be out of the
 office until June 23, 2008, and therefore cannot review or approve the draft answer in advance of
 June 19.

2. LINA and the LTD Plan therefore seek a six day-extension, up to June 25, 2008, to answer the complaint so that LINA's in-house counsel can review and comment on the answer.

3. In an email exchange on June 16, 2008, counsel for plaintiff and the co-defendant stated that they did not oppose this motion.

WHEREFORE, Defendants, LIFE INSURANCE COMPANY OF NORTH AMERICA, and YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN, respectfully request that this Honorable Court grant them a six day extension, up to June 25, 2008, to answer plaintiff's complaint.

Daniel K. Ryan
Peter E. Pederson
HINSHAW & CULBERTSON LLP
222 N. LaSalle Street, Suite 300
Chicago, Illinois 60601
(312) 704-3000
Fax: (312) 704-3001
dryan@hinshawlaw.com
ppederson@hinshawlaw.com

Respectfully submitted:
LIFE INSURANCE COMPANY OF NORTH AMERICA and YELLOW ROADWAY CORPORATION LONG-TERM DISABILITY INSURANCE PLAN

By: /s/ Peter E. Pederson
One of its Attorneys

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on June 18, 2008, I e-filed this motion using the Court's CM/ECF system, which will make a copy available to counsel of record identified below.

s/Peter E. Pederson

SERVICE LIST

Roger Sanford Hutchison, Esq.
rsh@dobbsandhutchison.com
DOBBS AND HUTCHISON
47 W Polk St
Chicago, IL 60605-2000

William R Pokorny, Esq.
wrp@franczek.com
FRANCZEK SULLIVAN P.C.
300 South Wacker Drive
Suite 3400
Chicago, Illinois 60606